

Heather M. Burke (SBN 284100)
WHITE & CASE LLP
3000 El Camino Real
2 Palo Alto Square, Suite 900
Palo Alto, CA 94306-2109
Telephone: (650) 213-0300
Facsimile: (650) 213-8158
hburke@whitecase.com

Kathryn J. Mims (*pro hac vice forthcoming*)
WHITE & CASE LLP
701 Thirteenth Street, NW
Washington, District of Columbia 20005
Telephone: (202) 626-3600
Facsimile: (202) 639-9355
kmims@whitecase.com

Jack E. Pace III (*pro hac vice forthcoming*)
WHITE & CASE LLP
1221 Avenue of the Americas
New York, NY 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
jpace@whitecase.com

Attorneys for Defendants Hikma Labs Inc.,
Hikma Pharmaceuticals USA Inc., Roxane
Laboratories, Inc., West-Ward Pharmaceuticals
Corp.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE CITY OF PROVIDENCE, RHODE
ISLAND, on behalf of itself and all others
similarly situated,

Plaintiffs,

v.

JAZZ PHARMACEUTICALS PLC;
ROXANE LABORATORIES, INC.; WEST-
WARD PHARMACEUTICALS CORP.;
HIKMA LABS INC.; HIKMA
PHARMACEUTICALS USA INC.; and
HIKMA PHARMACEUTICALS PLC,

Defendants.

Case No. 3:20-cv-04064-LB

**JOINT STIPULATION TO EXTEND
DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO THE
COMPLAINT**

Ctrm: B – 15th Floor
Judge: Magistrate Judge Laurel Beeler

Defendants Hikma Pharmaceuticals USA Inc., Hikma Labs Inc., Roxane Laboratories, Inc., and West-Ward Pharmaceuticals Corp. (collectively “Hikma Defendants”)¹ together with Plaintiff The City of Providence Rhode Island, by and through counsel, enter into this Stipulation pursuant to Civil Local Rule 6-1(a):

WHEREAS, the Complaint in the above-captioned matter was filed on June 18, 2020 (ECF No. 1);

WHEREAS, the Hikma Defendants’ response to the Complaint is currently due on July 15, 2020. The parties have not previously requested any extensions of time to respond to the Complaint;

WHEREAS the parties agree that additional time is appropriate for the Hikma Defendants to respond to the Complaint;

WHEREAS related cases asserting claims and allegations similar to those asserted here have been filed in this Court and at least one other federal District Court, and extending the Defendants’ time to respond would facilitate the coordination and early scheduling of this matter with the related cases;

WHEREAS this extension will not alter or otherwise impact the date of any event or deadline already fixed by Court order;

THE PARTIES HEREBY STIPULATE AND AGREE

1. That the deadline for the Hikma Defendants to answer or otherwise respond to the Complaint is extended 45 days to August 31, 2020;

2. That this agreement shall not be deemed a waiver by any of the Hikma Defendants of personal jurisdiction or any other defense, in this or any other case.

IT IS SO STIPULATED.

Respectfully submitted,

Dated: July 15, 2020

WHITE & CASE LLP

By: /s/ Heather M. Burke
Heather M. Burke (SBN 284100)

¹ Hikma Pharmaceuticals plc has not been served with the Complaint and is not participating in this Stipulation.

WHITE & CASE^{LLP}

3000 El Camino Real
2 Palo Alto Square, Suite 900
Palo Alto, CA 94306-2109
Telephone: (650) 213-0300
Facsimile: (650) 213-8158
hburke@whitecase.com

Jack E. Pace III (*pro hac vice forthcoming*)

WHITE & CASE^{LLP}

1221 Avenue of the Americas
New York, New York 10020
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
jpace@whitecase.com

Kathryn J. Mims (*pro hac vice forthcoming*)

WHITE & CASE^{LLP}

701 Thirteenth Street, NW
Washington, District of Columbia 20005
Telephone: (202) 626-3600
Facsimile: (202) 639-9355
kmims@whitecase.com

*Attorneys for Defendants Hikma Labs Inc., Hikma
Pharmaceuticals USA Inc., Roxane Laboratories,
Inc., West-Ward Pharmaceuticals Corp.*

Dated: July 15, 2020

WESTERMAN LAW CORP.

By: /s/ Michael M. Buchman
Jeff S. Westerman (SBN 94559)
WESTERMAN LAW CORP.
16133 Ventura Blvd., Suite 685
Encino, CA 91436
Tel: (310) 698-7450
jwesterman@jswlegal.com

Michael M. Buchman
Michelle C. Clerkin
MOTLEY RICE LLC
777 Third Avenue, 27th Floor
New York, NY 10017
(212) 577-0050
mbuchman@motleyrice.com
mclerkin@motleyrice.com

*Attorneys for Plaintiff The City of Providence,
Rhode Island, and the Proposed Class*

FILER'S ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), regarding signatures, I, Heather M. Burke, attest that concurrence in the filing of this document has been obtained.

Executed: July 15, 2020

/s/

Heather M. Burke

Heather M. Burke

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2020, the within documents were filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to the attorneys of record in this case.

Executed: July 15, 2020

/s/

Heather M. Burke

Heather M. Burke